

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DIGITAL MEDIA SOLUTIONS, LLC)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC <i>et</i>)	
<i>al.</i> ,)	
)	
Defendants.)	

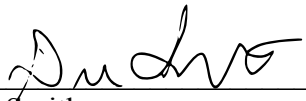
DECLARATION OF DREW SMITH

Drew Smith hereby declares under penalty of perjury that the following is true and correct:

1. I am a resident of the State of Ohio.
2. I make the within declaration from my own personal knowledge, and I am competent to so testify.
3. I am the Director of Infrastructure at Dream Center Education Holdings, LLC (“DCEH”).
4. In addition, DCEH controls a block of IP addresses at the Shared IT Platform. Upon information and belief, these IP addresses are worth in excess of one million dollars.
5. I am aware that Studio is interested in obtaining these IP addresses.

6. On April 9, 2019, Studio's Chief Information Officer, Kelly Kantola, was on site at the Pittsburgh Shared IT Platform. I am aware that Mr. Kantola asked a DCEH employee for a login and password to access these IP addresses. He was not given this access.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief. Executed the 10th day of April, 2019 in Pittsburgh,
PA.



Drew Smith